

McGREGOR W. SCOTT  
United States Attorney  
KEVIN C. KHASIGIAN  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700

## Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

V.

APPROXIMATELY \$19,820.00 IN  
U.S. CURRENCY,

Defendant.

2:20-MC-00322-TLN-KJN

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant William Schulz (“claimant”), by and through their respective counsel, as follows:

1. On or about September 29, 2020, claimant filed a claim in the administrative forfeiture proceeding with the United States Postal Inspection Service with respect to the Approximately \$19,820.00 in U.S. Currency (hereafter “defendant currency”), which was seized on or about July 22, 2020.

2. The United States Postal Inspection Service has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency

1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
2 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
3 That deadline is December 28, 2020.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to January  
5 27, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

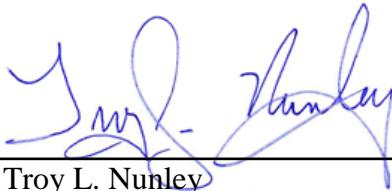
8 5. Accordingly, the parties agree that the deadline by which the United States shall be required  
9 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
10 the defendant currency is subject to forfeiture shall be extended to January 27, 2021.

11 Dated: 12/26/2020 McGREGOR W. SCOTT  
United States Attorney  
12 By: /s/ Kevin C. Khasigian  
13 KEVIN C. KHASIGIAN  
14 Assistant United States Attorney

15  
16 Dated: 12/26/2020 /s/ Richard Parker  
RICHARD PARKER  
Attorney for potential claimant  
William Schulz  
Mandell Law PA  
131 S New York Ave  
Winter Park, FL 32789  
Tel: (407) 457-8300  
Email: rparker@fightforyou.org  
21 (Signature authorized by email)  
17  
18  
19  
20  
21  
22  
23  
24

**IT IS SO ORDERED.**

Dated: December 28, 2020



25 \_\_\_\_\_  
Troy L. Nunley  
United States District Judge  
26  
27  
28